OBSERVATION REPORT #105

Verizon does not adhere to the procedures for System Outages (Type 1) established in the Verizon Change Control Notification Process.

Issue

During the review of the Verizon's WCCC (Wholesale Customer Care Center), KPMG Consulting has found that Verizon is not adhering to the System Outage procedures as established in the Verizon Change Control Notification Process.

KPMG Consulting has found several types of potential accuracy issues with the email announcement and the actual Bulletin Report. The following table is a sample listing of the 166 reviewed System Outage email announcements and bulletins sent to the CLECs. Our sample was taken from the period March 1, 2000 through February 28, 2001. The table below shows specific inaccuracies with the notification that was sent to the CLECs. The "Email Text" column represents what is listed in the text announcement of the message. The "Bulletin" column represents the actual attached notice sent to the CLECs that lists the detailed information about the outage. Each System Outage minimally requires Verizon to send an initial notice when the problem is identified and final notice when it is resolved. In certain instances, the problem was resolved within the normal interval time, which will allow a notice indicating "Final" only is sent to the CLECs.

Date	Outage #	Email Text (Initial/Final)	Bulletin (Initial/Final)	Comments
03/01/2000	10654	Initial		KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
03/03/2000	11291	Initial	Final	KPMG Consulting received notification that announced the "Initial" bulletin, however the attachment was a "Final" Bulletin.
03/06/2000	11596	Initial		KPMG Consulting received notification that only announced the "Initial" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.
03/10/2000	12162	Initial		KPMG Consulting received notification that only announced the "Initial" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.

Date	Outage #		Bulletin (Initial/Final)	Comments
03/15/2000	12821	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
03/15/2000	12740	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
03/16/2000	12958	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
03/16/2000	12975	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
03/27/2000	14007	Initial	Both	KPMG Consulting received notification that only announced the "Initial" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.
03/31/2000	14607	Initial	Both	KPMG Consulting received notification that only announced the "Initial" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.
04/01/2000	14707	Final		KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
04/04/2000	15197	Final	Both	KPMG Consulting received notification that only announced the "Final" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.
04/05/2000	15236	Both	Final	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Final" Bulletin.

Date	Outage #	Email Text (Initial/Final)	Bulletin (Initial/Final)	Comments
04/18/2000	16833	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
05/04/2000	19659	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
05/04/2000	19700	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
05/09/2000	20288	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
06/06/2000	25635	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
06/17/2000	28227	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
06/20/2000	28634	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
07/18/2000	33590	Final	Both	KPMG Consulting received notification that only announced the "Final" bulletin. However, one email contained the "Initial" bulletin and the other contained the "Final" Bulletin.

Date	Outage #	Email Text (Initial/Final)	Bulletin (Initial/Final)	Comments
07/31/2000	36587	Both	Final	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Final" Bulletin.
08/08/2000	38902	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
08/21/2000	46425	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
08/31/2000	56229	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
09/09/2000	64347	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin have been sent through the distribution list.
09/11/2000	65333	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
09/22/2000	76545	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
09/22/2000	76642	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.

Date	Outage #		Bulletin (Initial/Final)	Comments
10/04/2000	86078	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
10/05/2000	87298	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
11/01/2000	108532	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
10/25/2000	101237	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
10/17/2000	96278	Both	Initial	KPMG Consulting received notification with "Initial" and "Final" announcements, however, for the notification KPMG Consulting only received the "Initial" Bulletin.
11/27/2000	126236	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.
11/28/2000	126950	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
11/29/2000	128093	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
11/29/2000	128689	Initial	Initial	KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.
11/29/2000	131081	Final	Final	KPMG Consulting believes that the time difference between the Issue Identified Time and the Bulletin time requires that an "Initial" announcement and "Initial" Bulletin should have been sent through the distribution list.

Date	Outage #	Email Text (Initial/Final)	Bulletin (Initial/Final)	Comments
12/04/2000	131683	Initial		KPMG Consulting only received "Initial" announcements and bulletins with no "Final" announcements or bulletins.

Assessment

The results of our review indicated that 24% (40 of 166) of System Outage notifications, whether emails or bulletins, did not provide accurate information and documentation to the CLECs. Failure to properly notify CLEC's of such outages impedes operations and service to CLEC customers.

Verizon Response:

Verizon has previously acknowledged that the WCCC did not always follow the Change Management guidelines when issuing system outage or slow response notices. (Reference NJ Observation 93.) Our previous investigation indicated a number of the mistake were due to WCCC agent error. Additionally, specific individuals identified as causing the errors were released from Verizon. (This was also clarified with an update to NJ Observation 93.)

Since July 2000, the WCCC has implemented several significant changes aimed at enhancing the center's capabilities.

The WCCC has reorganized and moved to a new location with new personnel The WCCC the center operates 24X7

The WCCC management structure has been changed to add management Verizon management personnel.

There has been marked improvement in the notification process since the fourth quarter of 2000.

In reviewing the information referenced in the observation, Verizon does agree with some of KPMG examples, but certainly, not all. Without reviewing all the instances, Verizon does want to point to the most recent ones cited by KPMG. These are representative of the time frames after which Verizon made WCCC changes effective.

Example 1 Date 11/29/00 Outage # 128093

KPMG observation: no final Bulletin

VZ response: Initial Bulletin sent 10:34 AM Final Bulletin sent 11:42 AM

Several KPMG personnel on the mailing list

Example 2 Date 11/29/00 Outage # 128689

KPMG observation: no final Bulletin

VZ response: Initial Bulletin sent 3:33 PM Final Bulletin sent 3:54 PM

Several KPMG personnel on the mailing list

Example 3 Date 11/29/00 Outage # 131081

KPMG observation: no initial Bulletin

VZ response: Initial Bulletin sent 9:29 PM Final Bulletin sent 9:53 PM

Several KPMG personnel on the mailing list

Example 4
Date 12/4/00
Outage # 131683

KPMG observation: no final Bulletin

VZ response: Initial Bulletin sent 12:36 PM Final Bulletin sent 12:52 PM

Several KPMG personnel on the mailing list

In addition, Verizon would like to note that while the review extended through February 28, 2001, KPMG cited no instances of inaccurate notices being sent out in 2001. Verizon does not know why KPMG is unable to locate all the WCCC notices they were sent.